

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OKLAHOMA

STATE OF OKLAHOMA,)	
)	
Plaintiff,)	
v.)	Case No. 05-CV-329-GKF-SAJ
)	
TYSON FOODS, INC., et al.,)	
)	
Defendants.)	

**WILLOW BROOK FOODS, INC.'S SUPPLEMENTAL RESPONSES TO STATE
OF OKLAHOMA'S OCTOBER 11, 2007 SET OF REQUESTS TO ADMIT AND
REQUESTS FOR PRODUCTION**

COMES NOW Defendant, Willow Brook Foods, Inc., by and through counsel,
and for its Supplemental Responses to State of Oklahoma's October 11, 2007 Set of
Requests to Admit and Requests for Production, states as follows:

REQUESTS TO ADMIT

Request to Admit No. 2: Admit that poultry waste from one or more of your
poultry operations that has been spread on land located within the Illinois River
Watershed contains Escherichia coli (E. coli).

RESPONSE: Denied. Willow Brook denies that it has ever had a poultry operation
within the IRW. With respect to independent growers in the IRW with whom Willow
Brook contracted between 1999 and March 28, 2008, Willow Brook never tested/had
tested any of this excrement.

Request to Admit No. 3: Admit that poultry waste from one or more of your
poultry operations that has been spread on land located within the Illinois River
Watershed contains Enterococci.

RESPONSE: Denied. Willow Brook denies that it has ever had a poultry operation within the IRW. With respect to independent growers in the IRW with whom Willow Brook contracted between 1999 and March 28, 2008, Willow Brook never tested/had tested any of this excrement.

Request to Admit No. 4: Admit that poultry waste from one or more of your poultry operations that has been spread on land located within the Illinois River Watershed contains Brevibacteria.

RESPONSE: Denied. Willow Brook denies that it has ever had a poultry operation within the IRW. With respect to independent growers in the IRW with whom Willow Brook contracted between 1999 and March 28, 2008, Willow Brook never tested/had tested any of this excrement.

Request to Admit No. 5: Admit that fecal coliform contained in poultry waste from one or more of your poultry operations that has been spread on land located within the Illinois River Watershed has run-off from the land upon which it has been applied.

RESPONSE: Denied. Willow Brook denies that it has ever had a poultry operation within the IRW. With respect to independent growers in the IRW with whom Willow Brook contracted between 1999 and March 28, 2008, Willow Brook never tested/had tested any of this excrement .

Request to Admit No. 6: Admit that Escherichia coli (E. coli) contained in poultry waste from one or more of your poultry operations that has been spread on land located within the Illinois River Watershed has run-off from the land upon which it has been applied.

RESPONSE: Denied. Willow Brook denies that it has ever had a poultry operation within the IRW. With respect to independent growers in the IRW with whom Willow Brook contracted between 1999 and March 28, 2008, Willow Brook never tested/had tested any of this excrement.

Request to Admit No. 7: Admit that Enterococci contained in poultry waste from one or more of your poultry operations that has been spread on land located within the Illinois River Watershed has run-off from the land upon which it has been applied.

RESPONSE: Willow Brook denies that it has ever had a poultry operation within the IRW. With respect to independent growers in the IRW with whom Willow Brook contracted between 1999 and March 28, 2008, Willow Brook never tested/had tested any of this excrement and therefore denies this request.

Request to Admit No. 8: Admit that Brevibacteria contained in poultry waste from one or more of your poultry operations that has been spread on land located within the Illinois River Watershed has run-off from the land upon which it has been applied.

RESPONSE: Denied. Willow Brook denies that it has ever had a poultry operation within the IRW. With respect to independent growers in the IRW with whom Willow Brook contracted between 1999 and March 28, 2008, Willow Brook never tested/had tested any of this excrement.

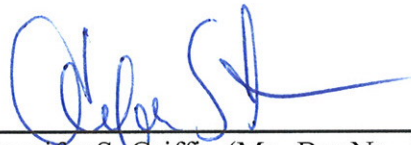
REQUEST FOR PRODUCTION

Request for Production No. 1: For each of the above Requests to Admit that you deny, please produce any and all documents in your possession, custody and control that support your denial.

RESPONSE: Willow Brook has no documents related to its lack of a poultry operation within the IRW. With respect to independent growers in the IRW with whom Willow Brook contracted between 1999 and March 28, 2008, Willow Brook has produced to Plaintiff the non-privileged documents in its possession related to its independent growers and it has no documents related to its lack of testing of excrement at farms owned and operated by former independent growers or research regarding said excrement outside of the context of this lawsuit.

Respectfully submitted,

LATHROP & GAGE, L.C.



Jennifer S. Griffin (Mo. Bar No. 44406)

Appearing Pro Hac Vice

314 East High Street

Jefferson City, Missouri 65101

(573) 761-5006 (telephone)

(573) 893-5398 (facsimile)

jgriffin@lathropgage.com

COUNSEL FOR WILLOW BROOK
FOODS, INC.

CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of September 2008, the foregoing document was electronically transmitted or sent via U.S. Mail to the following:

Jo Nan Allen jonanallen@yahoo.com, bacaviola@yahoo.com

Frederick C Baker fbaker@motleyrice.com, fhmorgan@motleyrice.com,
mcarr@motleyrice.com

Tim Keith Baker tbakerlaw@sbcglobal.net

James Taylor Banks jtbanks@hhlaw.com

Sherry P Bartley sbartley@mwsgw.com, jdavis@mwsgw.com

Woody Bassett wbassett@bassettlawfirm.com

Robert Murray Blakemore bblakemore@bullock-blakemore.com, bdejong@bullock-blakemore.com, nhodge@bullock-blakemore.com

Michael R. Bond michael.bond@kutakrock.com, bethany.wicker@kutakrock.com, sue.arens@kutakrock.com

Douglas L Boyd dboyd31244@aol.com

Vicki Bronson vbronson@cwlaw.com, lphillips@cwlaw.com

Paula M Buchwald pbuchwald@ryanwhaley.com, dmaple@ryanwhaley.com

Louis Werner Bullock lbullock@bullock-blakemore.com, bdejong@bullock-blakemore.com, nhodge@bullock-blakemore.com

LeAnne Turner Burnett burnettl@crowedunlevy.com, ECFT@crowedunlevy.com, kenneyj@crowedunlevy.com

L Bryan Burns bryan.burns@tyson.com

A Michelle Campney campneym@wwhwlaw.com, steelmana@wwhwlaw.com

Michael Lee Carr hm@holdenoklahoma.com, MikeCarr@HoldenOklahoma.com

Gary S Chilton gchilton@hcdattorneys.com

David Edward Choate dchoate@fec.net, brendab@fec.net

Lloyd E Cole , Jr colelaw@alltel.net, amy_colelaw@alltel.net, gloriaeubanks@alltel.net

Robin S Conrad rconrad@uschamber.com

Angela Diane Cotner AngelaCotnerEsq@yahoo.com

William S Cox , III wcox@lightfootlaw.com

Reuben Davis reuben.davis@mcafeetaft.com

Jim DePriest jim.depriest@arkansasag.gov

John Brian DesBarres mrjbdb@msn.com

Christopher Harold Dolan cdolan@faegre.com, cbrennan@faegre.com

W A Drew Edmondson fc_docket@oag.state.ok.us,
drew_edmondson@oag.state.ok.us, suzy_thrash@oag.state.ok.us.

Delmar R Ehrich dehrich@faegre.com, dherber@faegre.com, kcarney@faegre.com,
qsperrazza@faegre.com

John R Elrod jelrod@cwlaw.com, vmorgan@cwlaw.com

William Bernard Federman wfederman@aol.com, law@federmanlaw.com,
ngb@federmanlaw.com

Fidelma L Fitzpatrick ffitzpatrick@motleyrice.com, lgrande@motleyrice.com

Richard C Ford fordr@crowedunlevy.com, ECFT@crowedunlevy.com,
kenneyj@crowedunlevy.com

Bruce Wayne Freeman bfreeman@cwlaw.com, astall@cwlaw.com

Ronnie Jack Freeman jfreeman@grahamfreeman.com

Richard T Garren rgarren@riggsabney.com, dellis@riggsabney.com

Dorothy Sharon Gentry sgentry@riggsabney.com, jzielinski@riggsabney.com

Robert W George robert.george@tyson.com, olivia.mcclellan@tyson.com

Tony Michael Graham tgraham@grahamfreeman.com

James Martin Graves jgraves@bassettlawfirm.com

Michael D Graves mgraves@hallestill.com, jspring@hallestill.com,
smurphy@hallestill.com

Jennifer Stockton Griffin jgriffin@lathropgage.com, cshoemaker@lathropgage.com

Carrie Griffith carrie.elrodlaw@cox-internet.com

John Trevor Hammons Trevor_Hammons@oag.state.ok.us,
fc_docket@oag.state.ok.us, Jean_Burnett@oag.state.ok.us

Lee M Heath lheath@motleyrice.com

Michael Todd Hembree hembreeawl@aol.com, gwendy37@yahoo.com

Theresa Noble Hill thillcourts@rhodesokla.com, mnave@rhodesokla.com

Philip D Hixon phixon@mhla-law.com

Mark D Hopson mhopson@sidley.com

Kelly S Hunter Burch kelly_burch@oag.state.ok.us, fc_docket@oag.state.ok.us,
jean_burnett@oag.state.ok.us

Thomas Janer SCMJ@sbcglobal.net, lanaphillips@sbcglobal.net, tjaner@cableone.net

Stephen L Jantzen sjantzen@ryanwhaley.com, jlee@ryanwhaley.com,
mkeplinger@ryanwhaley.com

Mackenzie Lea Hamilton Jessie maci.tbakerlaw@sbcglobal.net,
macijessie@yahoo.com, tbakerlaw@sbcglobal.net

Bruce Jones bjones@faegre.com, cdolan@faegre.com, dybarra@faegre.com

Nikaa Baugh Jordan njordan@lightfootlaw.com

Jay Thomas Jorgensen jjorgensen@sidley.com, vshort@sidley.com

Krisann C. Kleibacker Lee kklee@faegre.com, mlokken@faegre.com

Derek Stewart Allan Lawrence hm@holdenoklahoma.com,
DerekLawrence@HoldenOklahoma.com

Raymond Thomas Lay rtl@kiralaw.com, dianna@kiralaw.com

Daniel Patrick Lennington daniel.lennington@oag.ok.gov

Nicole Marie Longwell nlongwell@mhla-law.com, lvictor@mhla-law.com

Dara D Mann dmann@mckennalong.com, dloudermilk@mckennalong.com,
ekim@faegre.com, jrock@faegre.com

Linda C Martin lmartin@dsda.com, mschooling@dsda.com

Archer Scott McDaniel smcdaniel@mhla-law.com, jwaller@mhla-law.com

Thomas James McGeady tjmcgeady@loganlowry.com

Robert Park Medearis , Jr medearislawfirm@sbcglobal.net

James Randall Miller (Terminated) rmiller@millerlawtulsa.com,

clagrone@millerlawtulsa.com, sgarrison@millerlawtulsa.com

Craig A Mirkes cmirkes@mhla-law.com, jwaller@mhla-law.com

Charles Livingston Moulton Charles.Moulton@arkansasag.gov,
Kendra.Jones@arkansasag.gov

Mark Richard Mullins richard.mullins@mcafeetaft.com,
allison.mack@mcafeetaft.com

Robert Allen Nance rnance@riggsabney.com, jzielinski@riggsabney.com

William H Narwold bnarwold@motleyrice.com, imoll@motleyrice.com

John Stephen Neas steve_neas@yahoo.com

George W Owens gwo@owenslawfirmpc.com, ka@owenslawfirmpc.com

David Phillip Page dpage@riggsabney.com, skinnett@riggsabney.com

Michael Andrew Pollard mpollard@boonesmith.com, kmiller@boonesmith.com,
pmappin@boonesmith.com

Jessica Eileen Rainey jrainey@titushillis.com, brandy@titushillis.com,
dgaddy@titushillis.com, sdodd@titushillis.com

Marcus N Ratcliff mratcliff@lswsl.com, sshanks@lswsl.com

Robert Paul Redemann rredemann@pmrlaw.net, psmith@pmrlaw.net

Barry Greg Reynolds reynolds@titushillis.com, brandy@titushillis.com

Melvin David Riggs driggs@riggsabney.com, jsummerlin@riggsabney.com

Randall Eugene Rose rer@owenslawfirmpc.com, ka@owenslawfirmpc.com

Michael G Rousseau mrousseau@motleyrice.com, lgrande@motleyrice.com

John David Russell jrussell@fellerssnider.com, mriley@fellerssnider.com,
tdowning@fellerssnider.com

Patrick Michael Ryan pryan@ryanwhaley.com, amcpherson@ryanwhaley.com,
jmickle@ryanwhaley.com

Robert E Sanders rsanders@youngwilliams.com

David Charles Senger david@cgmlawok.com, amy@cgmlawok.com

Jennifer Faith Sherrill jfs@federmanlaw.com, law@federmanlaw.com,
ngb@federmanlaw.com

Adam Joseph Siegel ajsiegel@hhlaw.com

Michelle B Skeens hm@holdenokla.com, mskeens@holdenokla.com

William Francis Smith bsmith@grahamfreeman.com

Leslie Jane Southerland ljsoutherlandcourts@rhodesokla.com,
mnave@rhodesokla.com

Monte W Strout strout@xtremeinet.net

Texas Association of Dairymen richard.mullins@mcafeetaft.com

Texas Cattle Feeders Association richard.mullins@mcafeetaft.com

Texas Farm Bureau richard.mullins@mcafeetaft.com

Texas Pork Producers Association richard.mullins@mcafeetaft.com

Erin Walker Thompson Erin.Thompson@kutakrock.com

Paul E Thompson , Jr pthompson@bassettlawfirm.com

Gordon D Todd gtodd@sidley.com

Colin Hampton Tucker chtucker@rhodesokla.com, scottom@rhodesokla.com

John H Tucker jtuckercourts@rhodesokla.com, gbarber@rhodesokla.com,
lwhite@rhodesokla.com

KC Dupps Tucker kctucker@bassettlawfirm.com

Mia Vahlberg mvahlberg@gablelaw.com, chayes@gablelaw.com,
courtfilings@gablelaw.com

William A Waddell , Jr waddell@fec.net

Kenneth Edward Wagner kwagner@lswsl.com, sshanks@lswsl.com

Todd P Walker twalker@faegre.com, hchristman@faegre.com

Elizabeth C Ward lward@motleyrice.com

Sharon K Weaver sweaver@riggsabney.com, lpearson@riggsabney.com

Timothy K Webster twebster@sidley.com, jwedeking@sidley.com

Gary Vincent Weeks gweeks@bassettlawfirm.com

Terry Wayen West terry@thewestlawfirm.com

Dale Kenyon Williams , Jr kwilliams@hallestill.com, jspring@hallestill.com,
smurphy@hallestill.com

Edwin Stephen Williams steve.williams@youngwilliams.com

P Joshua Wisley jwisley@cwlaw.com

J Ron Wright ron@wsfw-ok.com

Elizabeth Claire Xidis cxidis@motleyrice.com

Lawrence W Zeringue lzingue@pmrlaw.net, scouch@pmrlaw.net

4:05-cv-329 Notice has not been electronically mailed to:

Justin Allen
Office of the Attorney General (Little Rock)
323 Center St
Ste 200
Little Rock, AR 72201-2610

Jim Bagby
RR 2, Box 1711
Westville, OK 74965

David Gregory Brown
Lathrop & Gage LC
314 E HIGH ST
JEFFERSON CITY, MO 65101

Gordon W. Clinton
23605 S GOODNIGHT LN
WELLING, OK 74471

Susann Clinton
23605 S GOODNIGHT LN

WELLING, OK 74471

Eugene Dill
Address unknown

Marjorie Garman
5116 Highway 10
Tahlequah, OK 74464

James C Geiger
address unknown

Thomas C Green
Sidley Austin Brown & Wood LLP
1501 K ST NW
WASHINGTON, DC 20005

G Craig Heffington
20144 W SIXSHOOTER RD
COOKSON, OK 74427

Cherrie House
P O BOX 1097
STILWELL, OK 74960

William House
P O BOX 1097
STILWELL, OK 74960

John E. and Virginia W. Adair Family Trust
RT 2 BOX 1160
STILWELL, OK 74960

Dorothy Gene Lamb
Address unknown

James Lamb
Address unknown

Jerry M Maddux
Selby Connor Maddux Janer
P O BOX Z

BARTLESVILLE, OK 74005-5025

Doris Mares
14943 SE 15TH ST
CHOCTAW, OK 73020-7007

Dustin McDaniel
Office of the Attorney General (Little Rock)
323 Center St
Ste 200
Little Rock, AR 72201-2610

Jonathan D Orent
Motley Rice LLC (Providence)
321 S MAIN ST
PROVIDENCE, RI 02940

Donna S Parker
34996 S 502 RD
PARK HILL, OK 74451

Richard E Parker
34996 S 502 RD
PARK HILL, OK 74451

Steven B Randall
58185 COUNTY RD 658
KANSAS, OK 74347

Victor E Schwartz
Shook Hardy & Bacon LLP (Washington DC)
600 14TH ST NW STE 800
WASHINGTON, DC 20005-2004

Cary Silverman
Shook Hardy & Bacon LLP (Washington DC)
600 14TH ST NW STE 800
WASHINGTON, DC 20005-2004

George R Stubblefield
HC-66, BOX 19-12
PROCTOR, OK 74457

C Miles Tolbert
Secretary of the Environment
State of Oklahoma

3800 NORTH CLASSEN
OKLAHOMA CITY, OK 73118

Robin L. Wofford
Rt 2, Box 370
Watts, OK 74964

